

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS YACOBUCCI
(PostCom/USPS-T-25-1-2)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Yacobucci PostCom/USPS-T-25-1-2. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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PostCom/USPS-T-25-1. Please refer to Worksheet "Productivities" in LR-1-90.

(a) Please confirm that the volume variability factors in this worksheet are the ones that witness Bozzo developed using MODS data. If not confirmed, please explain.

(b) Please confirm that the Adjusted Productivities in this worksheet are equal to the Productivities divided by the Volume Variability Factors. If not confirmed, please explain.

(c) Please confirm that your model uses these adjusted productivities for flats and bundles sorted at BMCs and non-MODS facilities as well as flats and bundles sorted at MODS facilities. If not confirmed, please explain.

(d) Please confirm that the Postal Service's Cost Segment 3 costing method only applies these factors to MODS facilities. If not confirmed, please explain.

PostCom/USPS-T-25-2. Please refer to Worksheet "Vols-Std (A) Reg" in LR-1-90.

(a) What percentage of manual bundle sorts for Standard (A) Regular bundles occur at BMCs? Please provide all underlying calculations. If you cannot provide a precise answer, please provide an approximation.

(b) What percentage of manual bundle sorts for Standard (A) Regular bundles occur at non-MODS facilities? Please provide all underlying calculations. If you cannot provide a precise answer, please provide an approximation.

(c) What percentage of mechanical bundle sorts for Standard (A) Regular bundles occur at BMCs? Please provide all underlying calculations. If you cannot provide a precise answer, please provide an approximation.

(d) What percentage of mechanical bundle sorts for Standard (A) Regular bundles occur at non-MODS facilities? Please provide all underlying calculations. If you cannot provide a precise answer, please provide an approximation.

(e) What percentage of FSM sorts for Standard (A) Regular pieces occur at BMCs? Please provide all underlying calculations. If you cannot provide a precise answer, please provide an approximation.

(f) What percentage of FSM sorts for Standard (A) Regular pieces occur at non-MODS facilities? Please provide all underlying calculations. If you cannot provide a precise answer, please provide an approximation.

(g) What percentage of manual sorts for Standard (A) Regular pieces occur at BMCs? Please provide all underlying calculations. If you cannot provide a precise answer, please provide an approximation.

(h) What percentage of manual sorts for Standard (A) Regular pieces occur at non-MODS facilities? Please provide all underlying calculations. If you cannot provide a precise answer, please provide an approximation.

(i) Please confirm that the Postal Service's Cost Segment 3 costing method only applies these factors to MODS facilities. If not confirmed, please explain.